

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHAWAND EBANKS, individually and on behalf of all others similarly situated,

Plaintiff,

v.

REDBOX AUTOMATED RETAIL, LLC,

Defendant.

Judge Hon. Virginia M. Kendall
Magistrate Judge Hon. Jeffrey Cummings

No. 1:19-cv-04532

**JOINT MOTION FOR SECOND EXTENSION OF TIME FOR DEFENDANT TO
RESPOND TO COMPLAINT**

Defendant Redbox Automated Retail, LLC (“Defendant” or “Redbox”) and Plaintiff Shawand Ebanks (“Plaintiff” or “Ebanks”) (Plaintiff and Defendant together, the “Parties”), by and through their attorneys, hereby bring this joint motion for a 28-day extension of time, to and including September 6, 2019, for Defendant to respond to the Complaint filed by Plaintiff, and in support thereof state as follows:

1. Plaintiff filed this action against Redbox on June 6, 2019 in the Circuit Court of Cook County, Illinois, Chancery Division, case no. 2019CH06908 (the “Cook County Action”).

2. Defendant timely removed the Cook County Action to this Court on July 3, 2019.

See Dkt 1.

3. Although its response to the Complaint was initially due on July 10, 2019, Defendant requested and received from this Court a thirty-day extension of time—to and including August 9, 2019—to respond to Plaintiff’s Complaint. Dkts. 7, 9.

4. Counsel for the Parties have been working cooperatively to informally exchange information relevant to the Plaintiff’s claims and Defendant’s defenses, in an effort to streamline

the proceedings and minimize expenditure of Party and judicial resources. To that end, the Parties believe it is in their best interests to extend the deadline for Defendant's responsive pleading to allow them additional time to ascertain the facts pertinent to this matter prior to further involving the Court.

5. Accordingly, the Parties jointly request that the Court grant a second extension of time for Defendant to respond to Plaintiff's Complaint, for a period of 28 days, to and including September 6, 2019.

6. This motion for extension of time is being made before expiration of the deadline in question. The motion is brought in good faith, and the requested extension will not prejudice either Party nor unduly delay this judicial proceeding.

WHEREFORE, Plaintiff Shawand Ebanks and Defendant Redbox Automated Retail, LLC respectfully request that the Court extend the deadline for Defendant to respond to Plaintiff's Complaint for a period of 28 days, to and including September 6, 2019.

Dated: August 9, 2019

Respectfully submitted,

By: /s/ Martin W. Jaszcuk
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CERTIFICATE OF SERVICE

I, Margaret M. Schuchardt, an attorney, certify that I caused the foregoing document to be served via the CM/ECF system on August 9, 2019.

/s/ Margaret M. Schuchardt